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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

SIMKAR LLC,

Debtor.

Chapter 11

Case No.:19-22576 (RDD)

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DEBTOR'S DECLARATION PURSUANT TO LOCAL BANKRUPTCY RULE 1007-2

STATE OF NEW YORK)
) ss.:
COUNTY OF WESTCHESTER)

I, Alfred Heyer, declare as follows:

1. I am the Chief Executive Officer of Simkar LLC (the "**Debtor**" or "**Simkar**"), and the owner of its parent corporation Neo Lights Holding, Inc. ("**Neo Lights**").
2. Simkar Corporation, founded in 1952, is a U.S.-based manufacturer of linear and compact fluorescent, exit and emergency, HID, induction, LED, and vandal resistant lighting fixtures for commercial, industrial and residential applications (the "**Business**").

3. I acquired all of the assets and membership interests in the Debtor through a purchase of its membership interests on December 17, 2018, through my wholly owned corporation Neo Lights Holdings, Inc.
4. I submit this declaration in accordance with Local Bankruptcy Rule 1007-2 (the “**Declaration**”), on behalf of the Debtor in connection with its petition, exhibits and schedules filed, or to be filed in its Chapter 11 bankruptcy, for the purpose of apprising the Court and parties in interest of the circumstances that compelled the commencement of this case and in support of (i) Debtor’s chapter 11 petition filed March 6, 2019 (the “**Petition**”), and (ii) the motions and applications that the Debtor has filed, or will file, with the Court, including but not limited to, the first-day motions (the “**First Day Motions**”).
5. The Debtor has not previously filed a Chapter 11 Petition.
6. I have reviewed the Debtor's Petition, schedules, exhibits and all documents filed in connection therewith, including the First Day Motions, and I am familiar with the facts alleged and any relief requested therein.
7. All facts set forth in this Declaration are based upon my:(i) personal knowledge; (ii) review of relevant documents; and (iii) opinion based upon my experience and knowledge with respect to the Debtor's operations and financial condition. All financial information submitted with this Declaration is on an estimated and unaudited basis, unless otherwise indicated.

BACKGROUND OF THE DEBTOR AND ITS BUSINESS

a. Debtor's business and circumstances leading to the Debtor's filing. LR 1007-2(a)(1)

8. The Debtor was formed under the laws of the Commonwealth of Pennsylvania as a limited liability company on December 23, 1998, for the purpose of owning and operating the Business. The Debtor's predecessor was formed in Pennsylvania in 1952, under the name Sim-Kar Lighting Fixture Company. The Debtor is also known under the fictitious name Simkar Corporation. It maintains a web site at www.simkar.com.
9. On or about May 17, 2018, the Debtor's assets were acquired by Neo Lights, a company that offers renewable energy technology, developing and manufacturing LED. The purchase was restructured as a purchase of all of Debtor's membership interests on December 17, 2018.
10. The acquisition by Neo Lights was designed to provide Neo Lights with a manufacturing facility that could produce Neo Lights' proprietary products pursuant to a license agreement with Debtor.
11. Manufacturing of lighting products is mainly a product of China and the prices make direct competition unprofitable.
12. Neo Lights/Simkar however, produces smart products that are made in the United States which are in high demand.
13. Unfortunately, Simkar was burdened with over \$5 million dollars of unsecured debt when acquired by Neo Lights.
14. Further, Neo Lights and Simkar entered into a financing arrangement with Capstone Capital Group that provided approximately \$5.3 million dollars to Simkar that was used to pay-off a PNC Bank loan. Unfortunately, the arrangement with Capstone has resulted

in Neo Lights and Simkar being left with little or no cash to pay its monthly bills after the periodic sweeps of its bank accounts instigated by Capstone.

15. The arrangement with Capstone has several components. Capstone finances the purchase of raw materials/parts under a purchase order financing arrangement. When the products are manufactured, Capstone provides financing or factoring of the generated receivables and such funds are used to pay off the Capstone purchase order financing.
16. Further Capstone receives a “brokerage fee” for arranging the funding by a foreign company of the raw materials for ERSA contracts that are more fully described below.
17. Neo Lights and Simkar also entered into an SBA loan for \$5,000,000, which requires payment of approximately \$38,000 per month.
18. The Debtor has been transitioning from its legacy business of providing lighting products (the “Legacy Business”) to an energy efficient model where the Debtor’s products are installed in institutional facilities at no initial cost to the facilities (“ERSA Business”). Debtor.

Legacy Business

19. The Legacy Business is the manufacturing and sale of lighting products. This business has thin margins and the competition with the Chinese has made the Legacy Business unsustainable and unprofitable utilizing older technology. New technology must be produced to offer smart lighting products that have higher margins, have less Chinese competition, and are in demand by customers.

ERSA Business

20. ERSA stands for Energy Reduction Services Agreement. The Debtor is transitioning to ERSA Business since it is more profitable and under the current structure the Debtor is

paid quickly for its manufactured products. Currently the Debtor has many ERSA contracts in the works and several that are ready to be signed. The ERSA Business also facilitates the more rapid deployment of the smart lighting technology. A customer is able to receive smart lighting (with cameras and a host of other sensors that can be selected) which are connected via IOT and linked together as a system. This entire system is then financed with no out of pocket costs to the customer with a turn-key operation from manufacturing to installation by the original equipment manufacturer.

21. In the ERSA Business an affiliated company, Photonic Capital Inc¹ ("Photonic"), markets Debtor's products and receives an order to supply an institutional facility, such as a hospital, with its lighting needs. Hospitals can obtain energy efficient products from Debtor that they may not have the funds to acquire, and thus there is a tremendous demand. The hospital would pay Photonic a percentage of its energy savings. Photonic has a borrowing arrangement from which it draws to pay Debtor for the finished products to supply the institutional facility with its lighting needs. Accordingly, Simkar gets paid in cash for the products sold and collects a profit upon installation of the products. Photonic receives payment from the institutional facility and repays the funds it has borrowed and eventually makes a profit.
22. An affiliated company licenses technology to the Debtor pursuant to a license agreement.
23. Neo Lights owns real property in Philadelphia, Pennsylvania that houses the manufacturing plant that has a value of approximately \$10 million dollars, that is security for the SBA loan (\$5,000,000), a second mortgage loan (\$375,000) and the Capstone

¹ Photonic was previously owned by the owner of Neo Lights, Alfred Heyer who has an option to reacquire the company. Photonic Corporation is managed and operated by members of the Debtor's staff.

facility estimated by Capstone to be approximately \$5,300,000. The address of the manufacturing plant/property is 700 Ramona Street, Philadelphia, PA.

24. Neo Lights and Debtor also have offices in Manhattan at 125 Park Avenue, New York, New York and offices in Westchester County, New York.

DEBTOR'S DEBT, CAPITAL STRUCTURE AND MANAGEMENT

25. Debtor is liable (along with Neo Lights) on an SBA loan with Newtek in the amount of \$5,000,000. This loan is believed to be senior to all other debt.
26. MT has a loan of approximately \$375,000 which was substantially paid down upon the acquisition of Debtor by Neo Lights.
27. Capstone claims to have financing of \$5,300,000 which is in third place behind the SBA Loan and the MT loan.
28. There are five new loans that are styled as factoring arrangements pursuant to which a UCC was filed. These loans total approximately \$1,300,000.
29. The Debtor also has about \$6,100,000 of unsecured debt, mainly related to periods prior to the acquisition by Neo Lights.
30. The Debtor's Chief Executive Officer is Alfred Heyer, the sole owner of Neo Lights, and Neo Lights is the sole owner of the Debtor. Several other individuals are in management positions, Chris Myers (COO), David Coyne, (CFO), and James Burchetta (General Counsel). These individuals have management responsibilities under direction of the CEO but are have no ownership of the Debtor.

OBJECTIVES OF THE CHAPTER 11 CASE.

31. The Debtor has been choked for capital because Capstone sweeps all of its accounts on a daily basis. Besides making fees on the purchase order financing, and the receivables

financing, Capstone has also provided funds for payroll and other expenses of the company on a case by case basis. It is unclear how these funds are being treated under the agreements with Capstone.

32. Prior to the bankruptcy, Capstone encouraged the Debtor to file for bankruptcy and suggested that it would provide dip financing. Since the filing, Capstone has made clear that they will not lend any additional funds to Debtor.

33. Debtor has several sources of funding for the company, but needs time to vet these sources and put them in place.

b. LR 1007-2(a)(2)

34. This case was not originally commenced under Chapter 7 or 13 of the Bankruptcy Code.

c. Committees Organized Prior to Filing. LR 1007-2(a)(3)

35. A two-member creditor's committee has been formed as of March 22, 2019.

d. Holders of 20 Largest Unsecured Claims. LR 1007-2(a)(4)

36. The names and addresses of the twenty (20) largest unsecured creditors excluding (i) those creditors who or which would not be entitled to vote at a creditors' meeting under 11 USC Section 702; (ii) such creditors who were employees of the Debtor at the time of the filing of its petition for reorganization; and (iii) creditors who are insiders as that term is defined in 11 USC Section 101(31) are annexed hereto as **Exhibit "A"**.

e. Holders of the five largest Secured Claims. LR 1007-2(a)(5).

37. A list of the names and addresses of the five largest secured creditors is annexed hereto as **Exhibit "B"**.

f. Schedule of Assets and Liabilities. LR 1007-(2)(a)(6).

38. As required by Local Bankruptcy Rule 1007-2(a)(6), unaudited schedules of the Debtor's assets and liabilities are annexed hereto as **Exhibit "C"**

g. Publicly-Held Securities. LR 1007-(2)(a)(7).

39. No shares of stock, debentures, or other securities of the Debtor are publicly held.

h. Debtor's Premises. LR 1007-(2)(a)(9).

40. The Debtor has offices at 560 White Plains Road, Tarrytown, NY and 125 Park Avenue, New York, NY and its manufacturing plant is located at 700 Ramona Avenue, Philadelphia, Pennsylvania.

i. Location of Debtors' Assets and Books and Records. LR 1007-(2) (a)(10).

41. The Debtor's substantial assets and books and records are located at: the addresses set forth above. No assets are located outside the territorial limits of the United States.

j. Threatened or Pending Actions against Debtor. LR 1007-(2)(a)(11).

42. The following actions or proceedings are pending or threatened:

See attached **Exhibit "D"**

k. Debtor's Senior Management. LR 1007-(2)(a)(12).

43. The Debtor's senior manager is Alfred Heyer, CEO, 100 percent owner of Neo Lights and Neo Lights is the sole shareholder of the Debtor.

l. Additional Information if Business is to Continue. LR 1007-(2)(b)(1) and (2).

44. The Debtor's estimated amount of the payroll to employees (exclusive of officers, directors, stockholders and partners) for the thirty (30) day period following the filing of the chapter 11 petition is approximately \$195,000. The estimated amount of the monthly payroll payable to officers, stockholders and directors is \$48,000.

m. Estimated Schedule of cash receipts and disbursements for 30 days. LR 1007-(2) (b) (3).

45. The estimated schedule of cash receipts and disbursements for the thirty (30) day period following the filing of the Chapter 11 petition is annexed hereto as **Exhibit "E"**.

The First-Day Motions

46. The Debtor has filed a cash collateral motion which was heard on March 15, 2019 which has been continued to March 22, 2019. The Debtor also expects to file a motion to approve the continued use of certain of its bank accounts as well as a motion related to utilities. The Debtor is and will be seeking only limited relief in its First Day Motions. However, receiving this Court's approval of the relief sought in the First Day Motions is essential to transitioning the Debtor into chapter 11 which will provide the Debtor an opportunity to work towards a successful restructuring that will benefit all of the Debtor's creditors and stakeholders. I respectfully submit that (i) the relief requested in the First Day Motions is necessary to enable the Debtor to operate with minimal disruption during the pendency of this chapter 11 case, and (ii) prompt approval of the First Day Motions is warranted.

n. Conclusion

47. The Debtor submits that it has the requisite components to formulate a confirmable and feasible plan of reorganization whereby the business operations will be improved with the Debtor becoming more profitable. The Debtor is contemplating either a financing that will pay-off Capstone or a 363(f) sale of its key assets that would also pay-off Capstone.

48. The Debtor believes it is in the best interests of all of its creditors that it be afforded an opportunity to reorganize its obligations in Chapter 11.

Pursuant to 28 USC section 1746, I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: March 25, 2019

SIMKAR LLC

By: NEO LIGHTS HOLDINGS, INC., Manager

By:/s/ Alfred Heyer
Alfred Heyer, CEO

EXHIBIT A

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS
(see attached)

Fill in this information to identify the case:	
Debtor name	SIMKAR LLC
United States Bankruptcy Court for the:	SOUTHERN DISTRICT OF NEW YORK, WHITE PLAINS DIVISION
Case number (if known):	7:19-bk-22576

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
ALDER OPTOMECHANICAL NO. 171 TIANJIN STREET PINGZHEN CITY,	Christophe De Bary, SVP christophe.debarg e@alder.com	Vendor	Unliquidated Disputed			\$138,877.00
ARCBEST 4000 Richmond St Phila, PA 19137-1405	Steve Koplove (215) 546-5100	Trade debt				\$226,148.00
BDO 1700 Market St Fl 29 Phila, PA 19103-3929		Accountants				\$75,882.00
BEST LIGHTING PRODUCTS 1213 Etna Pkwy Pataskala, OH 43062-8041		Vendor				\$250,636.00
CAMDEN YARDS STEEL CO 2500 BROADWAY BLDG East Camden, NJ 08105	Mike Amato mamato@camdeny ardssteel.com	Vendor	Unliquidated Disputed			\$389,553.00
Complete Business Solutions Group 23 N 3rd St Philadelphia, PA 19106-4507		Loan	Unliquidated Disputed	\$250,000.00	\$0.00	\$250,000.00
EAGLERISE E & E INC 320 Constance Dr Ste 1 Warminster, PA 18974-2877		Vendor	Unliquidated Disputed			\$765,823.00

Debtor **SIMKAR LLC**
Name

Case number (if known) **7:19-bk-22576**

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Influx Capital LLC 32 Court St Ste 205 Brooklyn, NY 11201-4404		Loan	Unliquidated Disputed	\$270,000.00	\$0.00	\$270,000.00
LOCAL UNION 1158 IBEW ROCKWOOD OFFICE PARK 501 Carr Rd Ste 220 Wilmington, DE 19809-2866	Joe Calabro jpcalabro@ibew1158.com	Trade debt				\$102,802.00
MODE TRANSPORTATION LLC PO Box 71188 Chicago, IL 60694-1188	Jeff Blank jeff.blank@modetransportation.com (800) 592-7449	Trade debt				\$100,985.00
OLD DOMINION FREIGHT LINE PO BOX 415202 Boston, MA 02108	Deborah Haynes (336) 822-5255	Trade debt				\$184,514.00
OSRAM SYLVANIA INC PO Box 98218 Chicago, IL 60693-8218		Trade debt				\$203,898.00
PACE ELECTRONIC PRODUCTS 34 Foley Dr Sodus, NY 14551-1044		Trade debt				\$188,877.00
PHILIPS LIGHTING NORTH AMERICA CORP. PO BOX 100332 Rosemont, IL 60018		Vendor				\$263,036.00
S LITE CO LTD DONG KENG 3RD IND'L DISTR DONG KENG VILL		Trade debt	Unliquidated Disputed			\$160,157.00
SHENZHEN LONG SUN OPTOELECTRONIC S TECH CO BLOCK A WEIHAO H		Vendor				\$150,674.00
TRC ELECTRONICS INC. 4171 Stony Ln Doylestown, PA 18902-1160		Trade debt				\$160,692.00

Debtor **SIMKAR LLC**
Name

Case number (if known) **7:19-bk-22576**

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
UNITED HEALTHCARE 22703 Network PI Chicago, IL 60673-1227	Robert Peralta robert-a-peralta.com (860) 702-7641	Health Insurance				\$233,497.00
UNITED HEALTHCARE INS. CO 22703 Network PI Chicago, IL 60673-1227	Robert Peralta robert-a-peralta@u hc.com (860) 702-7641	Health Insurance				\$241,416.00
ZHEJIANG HENGDIAN TOSPO 3/F WORLD TRADE PLAZA WORLD TRADE CTR ZH		Trade debt	Unliquidated Disputed			\$70,216.00

EXHIBIT B

FIVE LARGEST SECURED CREDITORS

Capstone Credit LLC 810 7th Ave Fl 27 New York, NY 10019-5818	\$5,300,000
Newtek Small Business Finance LLC 1981 Marcus Ave Ste 130 New Hyde Park, NY 11042-1046	\$5,000,000
MMP Holdings LLC 171 Old Sachems Head Rd Guilford, CT 06437-3136	\$ 375,000
Influx Capital LLC 32 Court St Ste 205 Brooklyn, NY 11201-4404	\$ 270,000
Addy Source LLC 2361 Nostrand Ave Ste 501 Brooklyn, NY 11210-3954	\$ 250,000
Complete Business Solutions 23 N 3rd St Philadelphia, PA 19106-4507	\$ 250,000

EXHIBIT C

ASSETS	DESCRIPTION	VALUE
	Inventory	\$ 7,781,952.00
	Machinery, fixtures and equipment	\$ 3,000,000.00
	Bank Accounts	\$ 252,300.00
	Vehicles	\$ 880.00
	Accounts Receivable	\$ 828,555.94
Total Assets		\$ 11,863,687.94
LIABILITIES		
	SBA Loan*	\$ 5,000,000.00
	MMP*	\$ 375,000.00
	Capstone*	\$ 5,300,000.00
	Loans (payday)*	\$ 952,000.00
	Unsecured Creditors*	\$ 6,615,727.47
Total Liabilities		\$ 18,242,727.47
Net		\$ (6,379,039.53)

*Neo-Lights Holdings, Inc., the parent of the Debtor, is jointly liable on these debts.

EXHIBIT D

7. Legal actions, administrative proceedings, court actions, executions, attachments, or governmental audits

List the legal actions, proceedings, investigations, arbitrations, mediations, and audits by federal or state agencies in which the debtor was involved in any capacity—within 1 year before filing this case.

☐ None.

	Case title Case number	Nature of case	Court or agency's name and address	Status of case
7.1.	Yes Capital Group LLC -against- Simkar LLC, Neo Lights Holdings Inc., et. al. 000672/2019	Money Loaned	Oneida Supreme Court, NY	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.2.	Superior Cut Steel, LLC v. Simkar LLC d/b/a/ Simkar Corporation 2018/02373	Breach of Contract/failure to pay invoice	Court of common Please, Philadelphia, PA	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.3.	A Duie Pyle, Inc. v. Simkar LLC d/b/a/ Simkar Corporation 19-02-01030	Breach of Contract/ Unjust Enrichment for shipping services	Court of Common Please, Philadelphia, PA	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.4.	Averitt Express, Inc. v. Simkar LLC d/b/a Simkar Corporation 2018-148	Breach of contract for failure to pay for freight services.	Chancery Court for Putnam Co., TN	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.5.	Boucher Brothers LLC a/k/a Eagel Fence Company against Simkar Corporation SC-18-10-29-6542	Money owed for repair of fence	Philadelphia Municipal Court	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.6.	Factor Truck Service Inc. v. Simkar Lighting Corp. 19-02-01030	Breach of contract and related claims related to hauling services for which no payment was received	Court of Common Pleas, Philadelphia Co.	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.7.	Gormley-Farrington, Inc. v. Simkar LLC d/b/a Simkar Corporation, Neo Lights Holdings Inc. 19-01-00588	Breach of Independent Sales Representative Agreement	Court of Common Plea, Philadelphia Co.	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.8.	Kehoe Component Sales, Inc., d/b/a Pace Electronic Products v. Simkar Corporation and Simkar LLC CV083779/2019	Breach of contract for failure to pay for custom, made-to-order lighting products supplied by plaintiff.	County of Wayne, NY, Supreme Court	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.9.	Murata Machinery USA, Inc. v. Simkar Corp. SC-19-01-28-6233	Breach of contract for failure to pay for goods and/or services.	Philadelphia Mucnicipal Court	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.10	State of NC, Old Dominion Freight Line 19 CvS 51	Failure to pay for freight/ transportation services	State of NC, Guilford County (sjperior)	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

7.11	Pitt Ohio, LLC v. Simkar LLC 19-02-00934	Failure to pay for freight/transportation services	Ct. of Common Pleas, Philadelphia Co. PA	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.12	Ward Trucking, LLC v. Simkar LLC 181002950	Failure to pay for freight/transportation services.	PA Ct of Common Pleas, Philadelphia Co.	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.13	TRC Electronics Inc. v. Neo Lights Holdings, Inc. d/b/a/ Simkar Corporation and Simkar LLC 18-22554	Failure to pay for received and custom made products	TRC Electronics Inc.	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

	Case title Case number	Nature of case	Court or agency's name and address	Status of case
7.14	Pexco, LLC v. Simkar, LLC	Goods sold	Court of Common Pleas, Phil. County	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.15	Robert F. Flood Supply Corp. MJ-07201-CV-0000012-2019	Unpaid invoices	Commonwealth of Pennsylvania, Bucks Co.	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded
7.16	Pacific Die Cast, Inc. d/b/a QSSI Lighting & Electrical Products Group, Inc. v. Simkar LLC 18-CA-008795		Circuit Court, Hillsborough County, FL	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> On appeal <input type="checkbox"/> Concluded

EXHIBIT E

Simkar 30 day plan - 3/28/19

	Week ending 3/8		Week ending 3/15		Week ending 3/22		Week ending 3/29		Week ending 4/5		Week ending 4/12	
	Actual		Actual		Actual							
Revenue												
Sales												
Revenue - Legacy (Pre-petition PNC Lockbox Receipts)	\$	51,540	\$	274,791	\$	109,343	\$	100,000	\$	60,000	\$	105,000
e-Commerce (Pre-petition Inventory Receipts)	\$	1,200	\$	1,900	\$	2,059	\$	3,500	\$	7,500	\$	7,500
Total Sales	\$	52,740	\$	276,691	\$	111,402	\$	103,500	\$	67,500	\$	112,500
Direct Sales (Near Term - Post petition receipts)												
Wood St PG							\$	47,551			\$	47,551
St Christophers PG							\$	43,655			\$	43,655
Cromwell Commons								\$	13,163			
Total Direct Sales	\$	-	\$	-	\$	-	\$	91,206	\$	13,163	\$	91,206
ERSA's												
Winthrop Township								\$	66,063	\$	66,063	
Chester Township								\$	40,719	\$	40,719	
Other Townships												
Zitners								\$	20,706			
Hahnemann Hospital								\$	497,266	\$	-	
St Christophers Hospital								\$	-	\$	514,226	
Other ERSA (CSMI Schools/Other Townships)												
Total ERSA's	\$	-	\$	-	\$	-	\$	-	\$	624,754	\$	621,008
Total Revenue	\$	52,740	\$	276,691	\$	111,402	\$	194,706	\$	705,417	\$	824,714
Expenses												
COGS												
Legacy Purchase Parts								\$	75,000	\$	75,000	
Direct sales purchase parts/execution							\$	45,000				
ERSA Purchase Parts								\$	200,000	\$	200,000	
Total COGS	\$	-	\$	-	\$	-	\$	45,000	\$	275,000	\$	275,000
Payroll												
Factory - Weekly (20ppl) - Cut of 47%			\$	23,790	\$	23,790	\$	23,790	\$	23,790	\$	23,790
Salary - Bi Weekly (9ppl) Cut of 23%			\$	140,740	\$	137,134		\$	137,134			
Pension Contribution per CBA \$1.50/hr			\$	1,680	\$	1,680	\$	1,680	\$	1,680	\$	1,680
401(k) match per CBA			\$	700	\$	700	\$	700	\$	700	\$	700
Unemployment Insurance			\$	2,400	\$	2,400	\$	2,400	\$	2,400	\$	2,400
Total Payroll	\$	-	\$	169,310	\$	165,704	\$	28,570	\$	165,704	\$	28,570
Utilities												
PECO - deposit											\$	6,347
PGW - deposit											\$	5,472
Verizon - deposit											\$	1,958
Comcast - deposit											\$	272
ATT - deposit											\$	71
Provident Comm - Trash								\$	650			
Total Utilities	\$	-	\$	-	\$	-	\$	-	\$	650	\$	14,120

	Week ending 3/8 Actual	Week ending 3/15 Actual	Week ending 3/22 Actual	Week ending 3/29	Week ending 4/5	Week ending 4/12
Insurance						
IPFS - PPE/Workman's Comp/Gen Liability						\$ 39,410
US Premium Finance - Mangement Fee						\$ 10,094
Medical Insurance - UHC						\$ 62,504
Dental - Factory - Metlife - reinstatement				\$ 6,787		\$ 573
Dental - Office Allied Administrators - reinstatement				\$ 14,521		\$ 2,000
SunLife - Life/LTD/STD - reinstatement				\$ 710		\$ 3,800
Whitmore - Directors & Officers Insurance						\$ 5,342
Dental Reimbursement						
Total Insurance	\$ -	\$ -	\$ -	\$ 22,018	\$ -	\$ 123,723
General & Administrative						
Ceridian (payroll company)				\$ 1,500		
PHL Grant Rep (submittal for Phila grant project)						
Commissions - 5% (Legacy only)						\$ 25,000
Fisher Unitech (Solid Works Subscription)						
Auto Loan				\$ 888		
Help Systems (manage unemployment claims)						
Vanguard (imaging systems for all invoices)						
Raz-Lee Security (IBM computer security)						
BDK Inc (subscription for Lotus notes)						
NACM (credit check subscription)						
Employee Expenses						\$ 2,000
Unifirst (rubber matt service for safety)						
State Taxes						
Data processing, paper, office supplies						\$ 1,250
Protection One (24hr fire/police security)						
Bank service charges						
Philips licensing						
Total G&A	\$ -	\$ -	\$ -	\$ -	\$ 2,388	\$ 28,250
Leases/Agreements						
Neo Lights Holdings (Newtek Mortgage)				\$ 38,591		
NeoFunds by Neopost (Postage System)					\$ 649	
Standard Digital Leasing (copier lease)					\$ 1,043	
Standard Digital Imaging (copier useage fee)						
SPS Commerce (electronic data interface for 3rd parties)					\$ 582	
Concord Fax (fax invoice system)					\$ 250	
Wells Fargo Financial (large engineering plotter lease)						
Zuriel Lease agreement (technology license)						
Total Leases/Agreements	\$ -	\$ -	\$ -	\$ 38,591	\$ 2,524	\$ -
Taxes						
City Philadelphia Use & Occupancy						
City Philadelphia Water						
Commonwealth of PA - Sales & Use Tax						
2019 RE Taxes is calendar year - \$ are forward from 3/6/19						\$ 51,681
Total Taxes	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 51,681
Capstone Interest (Adequate Protection Payment)					\$ 27,000	
Total Expenses	\$ -	\$ 169,310	\$ 165,704	\$ 134,179	\$ 473,266	\$ 521,343
Profit/Loss by week	\$ 52,740	\$ 107,381	\$ (54,302)	\$ 60,527	\$ 232,151	\$ 303,371